

Message

From: Susan Schow [schow29@comcast.net]
Sent: 1/17/2018 5:29:28 PM
To: Beeler, Cindy [Beeler.Cindy@epa.gov]
Subject: Methane Edits
Attachments: Open and Closed Path Figures.png

Hi Cindy,
Many thanks for your offer of help!!

I did a global search for "NSPS OOOOa" within the current document and all I found was it listed in the first row of Table 3 - LDAR Regulations by Government and
And what David wrote himself in the Evaluation Section 5 (~pg 83).

5.2.1.8 Are there any regulatory requirements or barriers?

Are there any federal, state/provincial, or local regulations that mandate or prohibit specific performance criteria or technologies for the system? For example, regulatory requirements to measure both methane and VOC emissions may rule out the use of sensors that are specific to methane. A regulation may also establish specific performance criteria for alternative technologies, such as the NSPS OOOOa Alternative Means of Emissions Limitation, which requires systems to achieve equivalent or better annual emission reductions as semi-annual OGI. In these cases, meeting the regulatory requirement may be considered the primary objective of the system.

But there is an extensive section on this rule in the Regulations Appendix section at

C.1. United States – Federal Fugitive Methane Emission Regulations

C.1.1 Environmental Protection Agency

New Source Performance Standards (NSPS) for the Oil and Natural Gas Sector Subpart OOOOa [Citation: Federal Register Vol. 81, No. 107, 6/3/16, 35824-35942]

So I can link David's reference to this if you agree?

I have attached the figure with Open and Closed Paths. I hate for you to waste your time editing but I have not previous done so. What software used to edit – maybe I can google?

Even if it goes to the External review like this, it is not a deal breaker. But I found a table on another ITRC document and it if formatted as we suggested so I know we are right.

Thanks and I will be back in touch when I have more info.
Susan

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